REMARKS

Claims 1-16 are pending in the above-identified application. Claims 1-16 are rejected.

With this Response After Final, no claims are added, canceled, or amended. Accordingly, claims

1-16 remain at issue.

I.   35 U.S.C. § 102 Anticipation Rejection of Claims

Claims 1-16 are rejected under 35 U.S.C. § 102(e) as being purportedly anticipated *Rouse*

et al. (U.S. Patent Pub. 2002/0087260, hereinafter "*Rouse*"). Applicant respectfully traverses

this rejection.

Regarding independent claim 1, Applicant claims a method for downloading a file to a

personal digital assistant ("PDA") that recites, *inter alia*, the following limitations:

> "*determining a subset of functions associated with said file from a set of functions
> associated with an application corresponding to said file; and
>   dynamically downloading said file and only said subset of functions to said
> PDA.*"

Independent claim 9 has similar limitations.

The lack of specificity in the rejection has made responding to the rejection exceedingly

difficult. For example, the Examiner claims paragraph 44 of *Rouse* teaches the above limitations

of claim 1. While the Examiner asserts that *Rouse* discloses "a subset of functions," there is no

explanation on the part of *Rouse* or the Examiner as to which file these functions are associated

(see paragraph 44, ll. 6-8 of *Rouse*). Likewise, it is unclear what the Examiner regards as the

"application corresponding to said file." Applicant, by any reading of *Rouse*, is unable to

ascertain what might be remotely construed as teaching "determining a subset of functions

associated with said file from a set of functions associated with an application corresponding to

said file." Nevertheless, Applicant responds to the rejection to the best of his ability in view of the ambiguity.

Applicant respectfully submits that *Rouse* fails to teach every limitation of claim 1. The Examiner relies on paragraph 44 of *Rouse* to teach "determining a subset of functions..." and "dynamically downloading... said subset of functions to said PDA." However, *Rouse* does not teach that the "subset of functions" discussed in paragraph 44 are downloaded, but rather that the XSL style sheets are. The "subset of functions" and "XSL style sheets" are two completely different things. Moreover, *Rouse* fails to teach that the "subset of functions" is associated with a file, or that that file is associated with a corresponding application. Accordingly, *Rouse* fails to teach every limitation of claim 1. Likewise, *Rouse* also fails to teach every limitation of claim 9.

Rouse also fails to anticipate claims 2 and 3. To anticipate a claim, "[t]he identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). Regarding claim 2, *Rouse* fails to teach that the subset of functions is obtained "based on a user preference." The Examiner asserts that claim 2 is anticipated by Figure 2 of *Rouse*. While that figure does include box 216 labeled "User App Preferences," that box bears no relation to the determining step allegedly described at paragraph 44 of *Rouse*. User application preferences may be used for a number of reasons, as described in *Rouse*, but *Rouse* does not explicitly (or even implicitly) teach that user application preferences are used to obtain the "subset of functions" described at paragraph 44 (see also paragraph 39 of *Rouse*). Thus, *Rouse* does not teach every element in detail as recited by the claims, and the rejection should be withdrawn. Claim 10 recites similar limitations, and therefore is also patentable over *Rouse*.

Regarding claim 3, *Rouse* fails to teach that the subset of functions comprises "a family of functions." The Examiner asserts that claim 3 is anticipated at paragraph 22 of *Rouse*, which discloses providing a user with a set of customized replies. Again, Applicant submits that these customized replies bear no relation to the "subset of functions" described at paragraph 44 of *Rouse*, on which the Examiner relies to teach the "subset" of claim 3. Thus, *Rouse* does not teach every element in detail as recited by the claims, and the rejection should be withdrawn. Claim 11 recites similar limitations, and therefore is also patentable over *Rouse*.

Claims 4-8 depend from claim 1 and, therefore, should be deemed allowable for at least the same reasons as claim 1. Claims 12-16 depend from claim 9 and, therefore, should be deemed allowable for at least the same reasons as claim 9.
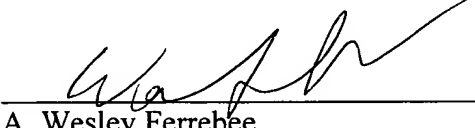
II.   Conclusion

In view of the above amendments and remarks, Applicant submits that all claims are allowable over the cited prior art, and respectfully requests early and favorable notification to that effect.

Respectfully submitted,

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A. Wesley Ferrebee
Registration No. 51,312

Customer Number 26263
SONNENSCHEIN NATH & ROSENTHAL LLP
P.O. Box 061080
Wacker Drive Station, Sears Tower
Chicago, IL 60606-1080
Phone: (202) 408-9214
Fax: (312) 876-7457